

EXHIBIT B

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Attorney for PACIFIC GAS AND
ELECTRIC COMPANY

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

Affects PG&E Corporation
X Affects Pacific Gas and Electric Company
Affects both Debtors

**All papers shall be filed in the Lead Case, No.
19-30088 (DM).*

Bankruptcy Case No. 19-30088(DM)

Chapter 11

(Lead Case) (Jointly Administered)

**PACIFIC GAS AND ELECTRIC
COMPANY'S RESPONSES TO
CREDITOR TODD GREENBERG'S
INTERROGATORIES, SET ONE, WITH
RESPECT TO CLAIM NO. 77335 (TODD
GREENBERG)**

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SET NO.: ONE

PRELIMINARY STATEMENT

PG&E makes this response without in any way waiving or intending to waive, but to the contrary, intending to reserve and reserving: (1) the right to produce, or object to production of, evidence of subsequently discovered information, documents, or interpretations thereof, and/or to supplement, edit, revise, modify, change or amend this response and any inadvertent errors or omission which may be contained herein, in light of any new information, which PG&E or its attorney may subsequently acquire or discover; (2) all questions as to competency, relevancy, materiality, privilege, and admissibility as evidence for any purpose, at any trial or hearing in this case or in any related or subsequent action or proceeding, if any, of any of the information or documents produced hereunder or the subject matter thereof; (3) the right to object on any ground to the use of information or documents produced hereunder or the subject matter thereof, at any trial or hearing in this case or in any related or

subsequent action or proceeding; and (4) the right to object on any ground at any time to a demand for further responses.

The Preliminary Statement is specifically incorporated by reference as though fully set forth in each response to the interrogatories below.

INTERROGATORY NO. 1:

DESCRIBE any and all facts RELATING TO PG&E Claim #A16108833 47 Bolinas Rd, Fairfax, California.

OBJECTIONS AND RESPONSE TO INTERROGATORY NO. 1:

PG&E objects to this interrogatory on the basis that it seeks information protected by the attorney-client privilege and/or attorney work product doctrine.

INTERROGATORY NO. 2:

IDENTIFY any and all DOCUMENTS RELATING TO PG&E Claim #A16108833 47 Bolinas Rd, Fairfax, California.

OBJECTIONS AND RESPONSE TO INTERROGATORY NO. 2:

PG&E objects to this interrogatory on the basis that it seeks information and DOCUMENTS protected by the attorney-client privilege and/or attorney work product doctrine.

INTERROGATORY NO. 3:

DESCRIBE any and all facts RELATING TO any and all PG&E operational activity, including repairs, construction or troubleshooting, whether by a PG&E crew or any contractor or subcontractor of or under the CONTROL of PG&E, or involving PG&E-owned equipment, at any location in Fairfax, California at any time during the period commencing on February 12, 2016 and ending on February 22, 2016.

OBJECTIONS AND RESPONSE TO INTERROGATORY NO. 3:

PG&E objects to this interrogatory on the basis that its scope is overly broad, pursuant to Judge Dennis Montali's 4/26/2021 Order allowing Greenberg limited discovery on his Claim No. 77335 only. PG&E further objects to this interrogatory on the basis that the information sought in this interrogatory is overly broad, vague and ambiguous and not reasonably limited to Greenberg's Claim

1 No. 77335 pursuant to Judge Montali's 4/26/2021 Order. PG&E will limit its response to this
2 interrogatory to Claim No. 77335 only. PG&E further objects to this interrogatory to the extent that it
3 calls for information protected by the attorney-client privilege and/or attorney work product doctrine.
4 PG&E further objects to this interrogatory on the basis that the term "operational activity" and phrase
5 "CONTROL of PG&E" are not defined or limited and are overly broad, vague and ambiguous.
6 Subject to and without waiving these objections, and based on its understanding of this interrogatory,
7 PG&E responds as follows: The Exhibit List attached to Greenberg's Proof of Claim No. 77335 seeks
8 damages allegedly caused by "PG&E power outages and surges which occurred when PG&E crews
9 were installing 3 phase 480 volt power at 31 Bolinas Rd, the commercial complex/restaurant next door
10 to our 47 Bolinas Rd, Fairfax location." 31 Bolinas Road, Fairfax, California is located on PG&E
11 Circuit San Rafael 1108. PG&E does not have any records of a planned or unplanned outage at this
12 circuit or the transformer it served during the dates of February 12 to February 22, 2016. At this
13 location, there was an ongoing project to install a new 600 amp 120/240V 3 phase service which
14 included the install of a new transformer. PG&E's records indicate one clearance for a planned outage
15 to energize the new facilities on the evening of March 16 to the morning of March 17, 2016.

16 **INTERROGATORY NO. 4:**

17 IDENTIFY any and All DOCUMENTS RELATING TO any and all PG&E operational
18 activity, including repairs, construction or troubleshooting, whether by a PG&E crew or any contractor
19 or subcontractor of or under the CONTROL of PG&E, or involving PG&E-owned equipment, at any
20 location in Fairfax, California at any time during the period commencing on February 12, 2016 and
21 ending on February 22, 2016.

22 **OBJECTIONS AND RESPONSE TO INTERROGATORY NO. 4:**

23 PG&E objects to this interrogatory on the basis that its scope is overly broad, pursuant to Judge
24 Dennis Montali's 4/26/2021 Order allowing Greenberg limited discovery on his Claim No. 77335
25 only. PG&E further objects to this interrogatory on the basis that the DOCUMENTS requested for
identification are overly broad, vague and ambiguous and not reasonably limited to DOCUMENTS
related to Greenberg's Claim No. 77335 pursuant to Judge Montali's 4/26/2021 Order. PG&E will

1 limit its response to this interrogatory to Claim No. 77335 only. PG&E further objects to this
2 interrogatory to the extent that it calls for information protected by the attorney-client privilege and/or
3 attorney work product doctrine. PG&E further objects to this interrogatory on the basis that the term
4 “operational activity” and phrase “CONTROL of PG&E” are not defined or limited and are overly
5 broad, vague and ambiguous. Subject to and without waiving these objections, and based on its
6 understanding of this interrogatory, PG&E responds as follows: PG&E identifies the following
7 DOCUMENTS, all of which are confidential in nature: February 2016 North Bay Outage Calendar;
8 February 9, 2016 Switching Log; February 9, 2016 Planned Outage Detail; February 23, 2016
9 Transformer Outage Request; and February 29, 2016 Switching Log.

10 **INTERROGATORY NO. 5:**

11 DESCRIBE any and all facts that YOU contend support or provide a basis for YOUR objection
12 to Claim No. 77335 in this case.

13 **OBJECTIONS AND RESPONSE TO INTERROGATORY NO. 5:**

14 PG&E objects to this interrogatory to the extent it calls for information protected by the
15 attorney-client privilege and/or attorney work product doctrine. PG&E further objects to this
16 interrogatory to the extent that it is duplicative of Interrogatory No. 3. Subject to and without waiving
17 these objections, and based on its understanding of this interrogatory, PG&E responds as follows: 31
18 Bolinas Road, Fairfax, California is located on PG&E Circuit San Rafael 1108. PG&E does not have
19 any records of a planned or unplanned outage at this circuit or the transformer it served during the
20 dates of February 12 to February 22, 2016.

21 **INTERROGATORY NO. 6:**

22 IDENTIFY any and All DOCUMENTS that YOU contend support or provide a basis for
23 YOUR objection to Claim No. 77335 in this case.

24 **OBJECTIONS AND RESPONSE TO INTERROGATORY NO. 6:**

25 PG&E objects to this interrogatory to the extent it calls for information protected by the
attorney-client privilege and/or attorney work product doctrine. PG&E further objects to this
interrogatory to the extent that it is duplicative of Interrogatory No. 4. Subject to and without waiving

1 these objections, and based on its understanding of this interrogatory, PG&E responds as follows:
2 PG&E identifies the following DOCUMENTS, all of which are confidential in nature: February 2016
3 North Bay Outage Calendar; February 9, 2016 Switching Log; February 9, 2016 Planned Outage
4 Detail; February 23, 2016 Transformer Outage Request; and February 29, 2016 Switching Log.

5
6 Dated: June 15, 2021

LAW OFFICES OF JENNIFER L. DODGE INC.

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8 
9 Jennifer L. Dodge

10 Attorney for PACIFIC GAS AND ELECTRIC
11 COMPANY
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3 Re: *In re Pacific Gas and Electric Company*

4 Superior Court of California, County of San Francisco, Case No. 19-30088(DM)

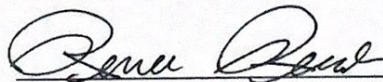
5
6 **VERIFICATION**

7
8 I, Renee Records, declare as follows:

9 I am the Manager of Law-Claims for Pacific Gas and Electric Company in the above-
10 captioned proceeding. I have read the foregoing document **PACIFIC GAS AND ELECTRIC**
11 **COMPANY'S RESPONSES TO DEBTOR TODD GREENBERG'S**
12 **INTERROGATORIES, SET ONE** and know its contents. The matters stated in the foregoing
13 document are true of my own knowledge, except as to those matters which are stated on
14 information and belief, and as to those matters I believe them to be true.

15 I declare under penalty of perjury under the laws of the State of California that the
16 foregoing is true and correct.

17 Executed on June 14, 2021 at San Ramon, California.

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19 

20 Renee Records
21 On behalf of Pacific Gas and Electric Company
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1 **PROOF OF SERVICE**

2 I, Jennifer L. Dodge, am a resident of the State of California, over the age of 18 years, and not a
3 party to the within action. I am a member of the bar of this Court. My business address is 2512
4 Artesia Blvd., Ste. 300D, Redondo Beach, California 90278.

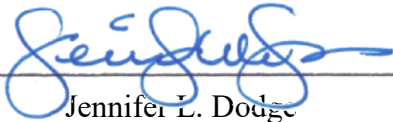
5 On June 16, 2021, I served the following document(s): **PACIFIC GAS AND ELECTRIC**
6 **COMPANY'S RESPONSES TO INTERROGATORIES, SET ONE, WITH RESPECT**
TO CLAIM NO. 77335 (TODD GREENBERG) on the party named below:

7 RICHARD A. LAPPING
8 TRODELLA & LAPPING LLP
9 540 Pacific Avenue
10 San Francisco, CA 94133
11 rich@trodellalapping.com
12 Attorney for Creditor Todd Greenberg

13 **(X) BY ELECTRONIC MAIL** Pursuant to the Federal Rules of Civil Procedure, the above
14 document(s) was/were served via electronic mail to the email address of counsel for the
15 represented party listed above. Transmission was reported as complete and without error.

16 **(X)** I declare under the penalty of perjury under the laws of the United States that the above
17 is true and correct.

18 Executed on June 16, 2021 at Redondo Beach, California.

19 
20 Jennifer L. Dodge

Jennifer L. Dodge, Esq., (SBN 195321)
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Attorney for PACIFIC GAS AND
ELECTRIC COMPANY

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

Affects PG&E Corporation
☒ Affects Pacific Gas and Electric Company
Affects both Debtors

**All papers shall be filed in the Lead Case, No.
19-30088 (DM)*

Bankruptcy Case No. 19-30088(DM)

Chapter 11

(Lead Case) (Jointly Administered)

**PACIFIC GAS AND ELECTRIC
COMPANY'S RESPONSES TO
CREDITOR TODD GREENBERG'S
REQUESTS FOR PRODUCTION OF
DOCUMENTS AND
ELECTRONICALLY STORED
INFORMATION, SET ONE, WITH
RESPECT TO CLAIM NO. 77335 (TODD
GREENBERG)**

**RESPONSES TO SPECIFIC REQUESTS FOR
PRODUCTION OF DOCUMENTS AND ESI, SET ONE**

PROPOUNDING PARTY: CREDITOR TODD GREENBERG

RESPONDING PARTY: DEBTOR PACIFIC GAS AND ELECTRIC COMPANY

SET NO.: ONE

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Debtor Pacific Gas and Electric Company ("PG&E") hereby responds to the first set of Requests for Production of Documents served by Creditor Todd Greenberg ("Greenberg") as follows:

PRELIMINARY STATEMENT

This response is based upon PG&E's understanding and perception of the nature and type of information requested, and upon the information presently known and available to PG&E and its counsel of record. PG&E has not completed its investigation or analysis of the facts and issues relating to this case, has not completed discovery, and has not completed preparation for trial. There may be other information or documents of which PG&E will become aware, or which will come into its possession at a later time, which may relate to these responses. Good faith efforts have been made to identify and obtain the information responsive to these requests for production of documents.

PG&E makes this response without in any way waiving or intending to waive, but to the contrary, intending to reserve and reserving: (1) the right to produce, or object to production of, evidence of subsequently discovered information, documents, or interpretations thereof, and/or to supplement, edit, revise, modify, change or amend this response and any inadvertent errors or omission which may be contained herein, in light of any new information, which PG&E or its attorney may subsequently acquire or discover; (2) all questions as to competency, relevancy, materiality, privilege, and admissibility as evidence for any purpose, at any trial or hearing in this case or in any related or subsequent action or proceeding, if any, of any of the information or documents produced hereunder or the subject matter thereof; (3) the right to object on any ground to the use of information or documents produced hereunder or the subject matter thereof, at any trial or hearing in this case or in any related or

subsequent action or proceeding; and (4) the right to object on any ground at any time to a demand for further responses.

The Preliminary Statement is specifically incorporated by reference as though fully set forth in each response to the requests for production of documents below.

GENERAL OBJECTIONS

PG&E objects to each of the requests for production on the following grounds:

1. PG&E objects to the requests for production to the extent they call for information and/or documents that are protected by the attorney-client privilege and/or the attorney work product doctrine. PG&E will not produce any such information or documents. Inadvertent production of any such privileged or protected information or documents shall not constitute waiver of any privilege, protection, or grounds for objecting to producing such information, and shall not waive PG&E's right to object to the use of such documents or information.
2. PG&E objects to the requests for production on the grounds that they are overly broad, unduly burdensome, and seek information that is neither relevant to the parties' claims or defenses in this action nor reasonably calculated to lead to the discovery of admissible evidence. Where possible, PG&E will make reasonable assumptions as to Greenberg's intended meaning and will respond accordingly, while preserving its objections as to vagueness, ambiguity, and insufficient particularity.
3. PG&E objects to the requests for production to the extent they impinge on constitutional, statutory, or common law rights of privacy.
4. PG&E objects to the requests for production to the extent that they seek information or documents that are within the knowledge of Greenberg, is a matter of public record, or is otherwise as easily obtained by Greenberg as by PG&E.
5. PG&E objects to the requests for production to the extent they seek disclosure of information and/or documents containing proprietary, confidential, and/or commercially sensitive business information, or otherwise violate PG&E's contractual obligations to maintain the confidentiality of information.

1 6. PG&E objects to the location and timing of production and will coordinate with counsel regarding
2 same prior to production.

3 These General Objections are specifically incorporated by reference as though fully set forth in
4 each response to the requests below. Subject to and without waiving these General Objections, PG&E
5 responds to each request as follows:

6 **REQUEST FOR PRODUCTION NO. 1:**

7 Any and All DOCUMENTS showing, scheduling, or evidencing any and all PG&E operational
8 activity, including repairs, construction or troubleshooting, whether by a PG&E crew or any contractor
9 or subcontractor of a PERSON under the CONTROL of PG&E, or involving PG&E-owned
10 equipment, at any location in Fairfax, California at any time during the period commencing on
11 February 12, 2016 and ending on February 22, 2016. An accurate summary attested to under penalty
12 of perjury providing the same information, with each location specified, and a brief description of the
13 work involved ins acceptable in lieu of copies of original documents.

14 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 1:**

15 PG&E objects to this Request on the basis that the scope of this Request is overly broad,
16 pursuant to Judge Dennis Montali's 4/26/2021 Order allowing Greenberg limited discovery on his
17 Claim No. 77335 only. PG&E further objects to this Request on the basis that the DOCUMENTS
18 sought in this Request are overly broad, vague and ambiguous and not reasonably limited to
19 DOCUMENTS related to Greenberg's Claim No. 77335 pursuant to Judge Montali's 4/26/2021 Order.
20 PG&E will limit the scope of any DOCUMENTS sought in this Request to DOCUMENTS related to
21 Claim No. 77335 only. PG&E further objects to this interrogatory to the extent that it calls for
22 information protected by the attorney-client privilege and/or attorney work product doctrine. PG&E
23 further objects to this interrogatory on the basis that the term "operational activity" and phrase
24 "CONTROL of PG&E" are not defined or limited and are overly broad, vague and ambiguous. PG&E
25 further objects to this Request to the extent that it seeks DOCUMENTS of third parties that are not in
the possession, custody or control of PG&E. Subject to and without waiving these objections, and

1 based on its understanding of this Request, PG&E responds as follows: PG&E will produce
2 DOCUMENTS responsive to this Request in its possession, custody or control.

3 **REQUEST FOR PRODUCTION NO. 2:**

4 Any and all DOCUMENTS that are part of or comprise the complete files of PG&E related to
5 this Claim No. 77335 and its predecessor claim, PG&E Claim #A16108833 47 Bolinas Rd., Fairfax,
6 California.

7 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 2:**

8 PG&E objects to this Request on the basis that it calls for information and DOCUMENTS
9 protected by the attorney-client privilege and/or attorney work product doctrine. Subject to and
10 without waiving this objection, and based upon its understanding of this Request, PG&E responds as
11 follows: A diligent search and reasonable inquiry has been made in an effort to comply with this
12 Request and no DOCUMENTS responsive to this Request ever existed in the possession, custody or
13 control of PG&E that are not otherwise privileged.

14 **REQUEST FOR PRODUCTION NO. 3:**

15 Any and all DOCUMENTS CONCERNING COMMUNICATIONS by GREENBERG to
16 YOU at any time during the period 2016 through 2019.

17 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 3:**

18 PG&E objects to this Request on the basis that the scope of this Request is overly broad,
19 pursuant to Judge Dennis Montali's 4/26/2021 Order allowing Greenberg limited discovery on his
20 Claim No. 77335 only. PG&E further objects to this Request on the basis that the DOCUMENTS
21 sought in this Request are overly broad, vague and ambiguous and not reasonably limited to
22 DOCUMENTS related to Greenberg's Claim No. 77335 pursuant to Judge Montali's 4/26/2021 Order.
23 PG&E will limit the scope of any DOCUMENTS sought in this Request to DOCUMENTS related to
24 Claim No. 77335 only. PG&E further objects to this Request to the extent that it calls for information
25 and DOCUMENTS protected by the attorney-client privilege and/or attorney work product doctrine.
PG&E further objects to this Request on the basis that Greenberg already has in his possession
DOCUMENTS sought by this Request. PG&E will not produce any DOCUMENTS responsive to this

1 Request that Greenberg already has in its possession. Subject to and without waiving these objections,
2 and based on its understanding of this Request, PG&E responds as follows: A diligent search and
3 reasonable inquiry has been made in an effort to comply with this Request and no DOCUMENTS
4 responsive to this Request ever existed in the possession, custody or control of PG&E that are not
5 otherwise privileged.

6 **REQUEST FOR PRODUCTION NO. 4:**

7 Any and all DOCUMENTS CONCERNING COMMUNICATIONS by YOU to
8 GREENBERG at any time during the period 2016 through 2019.

9 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 4:**

10 PG&E objects to this Request on the basis that the scope of this Request is overly broad,
11 pursuant to Judge Dennis Montali's 4/26/2021 Order allowing Greenberg limited discovery on his
12 Claim No. 77335 only. PG&E further objects to this Request on the basis that the DOCUMENTS
13 sought in this Request are overly broad, vague and ambiguous and not reasonably limited to
14 DOCUMENTS related to Greenberg's Claim No. 77335 pursuant to Judge Montali's 4/26/2021 Order.
15 PG&E will limit the scope of any DOCUMENTS sought in this Request to DOCUMENTS related to
16 Claim No. 77335 only. PG&E further objects to this Request to the extent that it calls for information
17 and DOCUMENTS protected by the attorney-client privilege and/or attorney work product doctrine.
18 PG&E further objects to this Request on the basis that Greenberg already has in his possession
19 DOCUMENTS sought by this Request. PG&E will not produce any DOCUMENTS responsive to this
20 Request that Greenberg already has in its possession. Subject to and without waiving these objections,
21 and based on its understanding of this Request, PG&E responds as follows: A diligent search and
22 reasonable inquiry has been made in an effort to comply with this Request and no DOCUMENTS
23 responsive to this Request ever existed in the possession, custody or control of PG&E that are not
24 otherwise privileged.

25 **REQUEST FOR PRODUCTION NO. 5:**

Any and all DOCUMENTS CONCERNING COMMUNICATIONS by any PERSON to YOU
CONCERNING 47 Bolinas Rd, Fairfax, California at any time during the period 2016 through 2019.

1 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 5:**

2 PG&E objects to this Request on the basis that this Request is overly broad in time and scope,
3 pursuant to Judge Dennis Montali's 4/26/2021 Order allowing Greenberg limited discovery on his
4 Claim No. 77335 only. PG&E further objects to this Request on the basis that the DOCUMENTS
5 sought in this Request are overly broad, vague and ambiguous and not reasonably limited to
6 DOCUMENTS related to Greenberg's Claim No. 77335 pursuant to Judge Montali's 4/26/2021 Order.
7 PG&E will limit the scope of any DOCUMENTS sought in this Request to DOCUMENTS related to
8 Claim No. 77335 only. PG&E further objects to this Request to the extent that it is duplicative of
9 Request No. 3. PG&E further objects to this Request to the extent it calls for information and
10 DOCUMENTS protected by the attorney-client privilege and/or attorney work product doctrine.
11 PG&E further objects to this Request on the basis that Greenberg already has in his possession
12 DOCUMENTS sought by this Request. PG&E will not produce any DOCUMENTS responsive to this
13 Request that Greenberg already has in its possession. Subject to and without waiving these objections,
14 and based on its understanding of this Request, PG&E responds as follows: A diligent search and
15 reasonable inquiry has been made in an effort to comply with this Request and no DOCUMENTS
16 responsive to this Request ever existed in the possession, custody or control of PG&E that are not
otherwise privileged.

17 **REQUEST FOR PRODUCTION NO. 6:**

18 Any and all DOCUMENTS CONCERNING COMMUNICATIONS by YOU to any PERSON
19 CONCERNING 47 Bolinas Rd, Fairfax, California at any time during the period 2016 through 2019.

20 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 6:**

21 PG&E objects to this Request on the basis that this Request is overly broad in time and scope,
22 pursuant to Judge Dennis Montali's 4/26/2021 Order allowing Greenberg limited discovery on his
23 Claim No. 77335 only. PG&E further objects to this Request on the basis that the DOCUMENTS
24 sought in this Request are overly broad, vague and ambiguous and not reasonably limited to
25 DOCUMENTS related to Greenberg's Claim No. 77335 pursuant to Judge Montali's 4/26/2021 Order.
PG&E will limit the scope of any DOCUMENTS sought in this Request to DOCUMENTS related to

1 Claim No. 77335 only. PG&E further objects to this Request to the extent that it is duplicative of
2 Request No. 4. PG&E further objects to this Request to the extent it calls for information and
3 DOCUMENTS protected by the attorney-client privilege and/or attorney work product doctrine.
4 PG&E further objects to this Request on the basis that Greenberg already has in his possession
5 DOCUMENTS sought by this Request. PG&E will not produce any DOCUMENTS responsive to this
6 Request that Greenberg already has in its possession. Subject to and without waiving these objections,
7 and based on its understanding of this Request, PG&E responds as follows: A diligent search and
8 reasonable inquiry has been made in an effort to comply with this Request and no DOCUMENTS
9 responsive to this Request ever existed in the possession, custody or control of PG&E that are not
10 otherwise privileged.

11 **REQUEST FOR PRODUCTION NO. 7:**

12 Any and all DOCUMENTS CONCERNING COMMUNICATIONS by any PERSON to YOU
13 CONCERNING PG&E Claim #A16108833 47 Bolinas Rd, Fairfax, California at any time during the
14 period 2016 through 2019.

15 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 7:**

16 PG&E objects to this Request on the basis that it calls for information and DOCUMENTS
17 protected by the attorney-client privilege and/or attorney work product doctrine. PG&E further objects
18 to this Request on the basis that Greenberg already has in his possession DOCUMENTS sought by this
19 Request. PG&E will not produce any DOCUMENTS responsive to this Request that Greenberg
20 already has in its possession. Subject to and without waiving these objections, and based upon its
21 understanding of this Request, PG&E responds as follows: A diligent search and reasonable inquiry
22 has been made in an effort to comply with this Request and no DOCUMENTS responsive to this
23 Request ever existed in the possession, custody or control of PG&E that are not otherwise privileged.

24 **REQUEST FOR PRODUCTION NO. 8:**

25 Any and all DOCUMENTS CONCERNING COMMUNICATIONS by YOU to any PERSON
CONCERNING PG&E Claim #A16108833 47 Bolinas Rd, Fairfax, California at any time during the
period 2016 through 2019.

1 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 8:**

2 PG&E objects to this Request on the basis that it calls for information and DOCUMENTS
3 protected by the attorney-client privilege and/or attorney work product doctrine. PG&E further objects
4 to this Request on the basis that Greenberg already has in his possession DOCUMENTS sought by this
5 Request. PG&E will not produce any DOCUMENTS responsive to this Request that Greenberg
6 already has in its possession. Subject to and without waiving these objections, and based upon its
7 understanding of this Request, PG&E responds as follows: A diligent search and reasonable inquiry
8 has been made in an effort to comply with this Request and no DOCUMENTS responsive to this
9 Request ever existed in the possession, custody or control of PG&E that are not otherwise privileged.

10 **REQUEST FOR PRODUCTION NO. 9:**

11 Any and all DOCUMENTS RELATING TO YOUR answers to CREDITOR TODD
12 GREENBERG'S INTERROGATORIES, SET ONE, WITH RESPECT TO CLAIM NO. 77335
13 (TODD GREENBERG) served concurrently herewith.

14 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 9:**

15 PG&E objects to this Request on the basis that the scope of the DOCUMENTS sought in this
16 Request is overly broad for the reasons outlined in its objections to both the Interrogatories and
17 Requests for Production of Documents propounded by Greenberg. PG&E further objects to this
18 Request to the extent that it calls for information and DOCUMENTS protected by the attorney-client
19 privilege and/or attorney work product doctrine. Subject to and without waiving these objections, and
20 based on its understanding of this Request, PG&E responds as follows: PG&E will produce
21 documents responsive to this Request in its possession, custody or control that are not otherwise
22 privileged.

23 **REQUEST FOR PRODUCTION NO. 10:**

24 Any and all DOCUMENTS that YOU contend support or provide a basis for YOUR objection
25 to Claim No. 77335 in this case.

1 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 10:**

2 PG&E objects to this interrogatory to the extent it calls for information and DOCUMENTS
3 protected by the attorney-client privilege and/or attorney work product doctrine. PG&E further objects
4 to this Request on the basis that Greenberg already has in his possession DOCUMENTS sought by this
5 Request. PG&E will not produce any DOCUMENTS responsive to this Request that Greenberg
6 already has in its possession. Subject to and without waiving these objections, and based on its
7 understanding of this Request, PG&E responds as follows: PG&E will produce documents responsive
8 to this Request in its possession, custody or control that are not otherwise privileged.

9
10 Dated: June 15, 2021

LAW OFFICES OF JENNIFER L. DODGE INC.

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14 Jennifer L. Dodge

15 Attorney for PACIFIC GAS AND ELECTRIC
16 COMPANY
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3 Re: *In re PG&E Corporation and Pacific Gas and Electric Company*

4 United States Bankruptcy Court, Northern District of California, San Francisco Division, Case
5 No. 19-30088 (DM)

6
7 **VERIFICATION**

8
9 I, Renee Records, declare as follows:

10 I am the Manager of Law-Claims for Pacific Gas and Electric Company, debtor in the above-
11 captioned proceeding. I have read the foregoing document **DEBTOR PACIFIC GAS AND**
12 **ELECTRIC COMPANY'S RESPONSES TO CREDITOR TODD GREENBERG'S**
13 **REQUESTS FOR PRODUCTION OF DOCUMENTS, SET ONE** and know its contents. The
14 matters stated in the foregoing document are true of my own knowledge, except as to those matters
15 which are stated on information and belief, and as to those matters I believe them to be true.

16 I declare under penalty of perjury under the laws of the State of California that the
17 foregoing is true and correct.

18 Executed on June 14, 2021 at San Ramon, California.

19
20 

21 Renee Records
22 On behalf of Pacific Gas and Electric Company
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1 **PROOF OF SERVICE**

2 I, Jennifer L. Dodge, am a resident of the State of California, over the age of 18 years, and not a
3 party to the within action. I am a member of the bar of this Court. My business address is 2512
4 Artesia Blvd., Ste. 300D, Redondo Beach, California 90278.

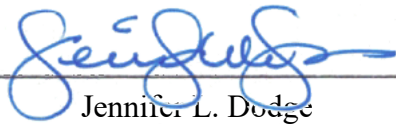
5 On June 16, 2021, I served the following document(s): **PACIFIC GAS AND ELECTRIC**
6 **COMPANY'S RESPONSES TO REQUESTS FOR PRODUCTION OF DOCUMENTS**
7 **AND ELECTRONICALLY STORED INFORMATION, SET ONE, WITH RESPECT**
8 **TO CLAIM NO. 77335 (TODD GREENBERG)** on the party named below:

9 RICHARD A. LAPPING
10 TRODELLA & LAPPING LLP
11 540 Pacific Avenue
12 San Francisco, CA 94133
13 rich@trodellalapping.com
14 Attorney for Creditor Todd Greenberg

15 **(X) BY ELECTRONIC MAIL** Pursuant to the Federal Rules of Civil Procedure, the above
16 document(s) was/were served via electronic mail to the email address of counsel for the
17 represented party listed above. Transmission was reported as complete and without error.

18 **(X)** I declare under the penalty of perjury under the laws of the United States that the above
19 is true and correct.

20 Executed on June 16, 2021 at Redondo Beach, California.

21 
22 Jennifer L. Dodge

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
	<div>Closed1detail</div> <div>ALTO 1120 WOODACRE 1101 BAHIA 1104 <SAN RAFAEL-BK2> <LAS GALLINAS A-BK2> *PT*SAN RAFAEL 1107 *PT*SAN RAFAEL 1107</div>	<div>Closed2detail</div> <div>WOODACRE 1101 LAS GALLINAS A-TRANSFORMER BANK 1 SAN RAFAEL 1107 <SAN RAFAEL-BK2> <LAS GALLINAS A-BK2] *PT*GREENBRAE 1104</div>	<div>3detail</div> <div>WOODACRE 1101 ALTO 1124 BAHIA 1101 SAN RAFAEL 1107 OLEMA 1101 <SAN RAFAEL-BK2> *PT*SAUSALITO 1102 *PT*OLEMA 1101 *PT*NOVATO 1102</div>	<div>Closed4detail</div> <div><SAN RAFAEL-BK2> [GREENBRAE 1101]> *PT*SAN RAFAEL 1106</div>	<div>Closed5detail</div> <div>LAS GALLINAS SUB Apparatus NEW 115KV BUS PT, CS186 ANDTB#2 RELAYS SAN RAFAEL 1106 <SAN RAFAEL-BK2> <GREENBRAE 1101] *PT*SAN RAFAEL 1107</div>	<div>Closed6detail</div> <div><SAN RAFAEL-BK2></div>
<div>Closed7detail</div> <div><SAN RAFAEL-BK2></div>	<div>Attn8detail</div> <div>SAUSALITO SUB Breaker 1102 <SAN RAFAEL-BK2> *PT*WOODACRE 1101 *PT*ALTO 1125</div>	<div>Closed9detail</div> <div>SAN RAFAEL 1105 ALTO 1124 SAN RAFAEL 1108 <SAN RAFAEL-BK2> [LAS GALLINAS SUB Bus 12kV Bus F, Bank 2, Sta BK 2, BK 2 PT.> *PT*GREENBRAE 1103</div>	<div>Closed10detail</div> <div><SAN RAFAEL-BK2> <LAS GALLINAS SUB Bus 12kV Bus F, Bank 2, Sta BK 2, BK 2 PT.> *PT*IGNACIO 1104 *PT*SAN RAFAEL 1102</div>	<div>Closed11detail</div> <div>IGNACIO 1104 <SAN RAFAEL-BK2> <LAS GALLINAS SUB Bus 12kV Bus F, Bank 2, Sta BK 2, BK 2 PT.] [LAS GALLINAS SUB Apparatus Temporary shoo-fly cables.> [LAS GALLINAS SUB Bus 12kV Bus F & G, 1107/2.> *PT*OLEMA 1101</div>	<div>Closed12detail</div> <div>LAS GALLINAS SUB Apparatus 12KV Shoo-fly LAS GALLINAS SUB LAS GALLINAS SUB Bus 12kV Main bus E & F <SAN RAFAEL-BK2> <LAS GALLINAS SUB Apparatus Temporary shoo-fly cables.] <LAS GALLINAS SUB Bus 12kV Bus F & G, 1107/2.] [LAS GALLINAS SUB Bus 12kV Main bus F, 12kV Aux bus F, Bank 2. ></div>	<div>Closed13detail</div> <div><SAN RAFAEL-BK2> <LAS GALLINAS SUB Bus 12kV Main bus F, 12kV Aux bus F, Bank 2. ></div>
<div>Closed14detail</div> <div><SAN RAFAEL-BK2> <LAS GALLINAS SUB Bus 12kV Main bus F, 12kV Aux bus F, Bank 2. ></div>	<div>Closed15detail</div> <div><SAN RAFAEL-BK2> <LAS GALLINAS SUB Bus 12kV Main bus F, 12kV Aux bus F, Bank 2. ></div>	<div>Closed16detail</div> <div>LAS GALLINAS SUB Breaker 1104 IGNACIO SUB Apparatus CB 1102/2 AND A SECTION OF THE 1102 CIRCUIT SAN RAFAEL 1109 <SAN RAFAEL-BK2> <LAS GALLINAS SUB Bus 12kV Main bus F, 12kV Aux bus F, Bank 2. > *PT*SAN RAFAEL 1109 *PT*SAN RAFAEL 1109</div>	<div>Attn17detail</div> <div>WOODACRE 1101 <SAN RAFAEL-BK2> <LAS GALLINAS SUB Bus 12kV Main bus F, 12kV Aux bus F, Bank 2. > *PT*NOVATO 1104 *PT*NOVATO 1104 *PT*OLEMA 1101</div>	<div>Closed18detail</div> <div>ALTO 1120 <SAN RAFAEL-BK2> <LAS GALLINAS SUB Bus 12kV Main bus F, 12kV Aux bus F, Bank 2. > *PT*SAN RAFAEL 1107</div>	<div>Closed19detail</div> <div><SAN RAFAEL-BK2> <LAS GALLINAS SUB Bus 12kV Main bus F, 12kV Aux bus F, Bank 2. > *PT*ALTO 1120</div>	<div>Closed20detail</div> <div>IGNACIO 1103 <SAN RAFAEL-BK2> <LAS GALLINAS SUB Bus 12kV Main bus F, 12kV Aux bus F, Bank 2. ></div>

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
<div><div>Closed</div><div>21</div><div>detail</div></div> <div><SAN RAFAEL-BK2> <LAS GALLINAS SUB Bus 12kV Main bus F, 12kV Aux bus F, Bank 2. ></div>	<div><div>Closed</div><div>22</div><div>detail</div></div> <div>IGNACIO 1103 <SAN RAFAEL-BK2> <LAS GALLINAS SUB Bus 12kV Main bus F, 12kV Aux bus F, Bank 2. > *PT*IGNACIO 1104 *PT*SAN RAFAEL 1107 *PT*SAN RAFAEL 1106</div>	<div><div>Closed</div><div>23</div><div>detail</div></div> <div>HIGHWAY 1102 Field Equipment LR 650 IGNACIO 1103 GREENBRAE 1102 WOODACRE 1101 SAN RAFAEL SUB Bus 12kV Aux bus and 1110 circuit to first field switch. <SAN RAFAEL-BK2> <LAS GALLINAS SUB Bus 12kV Main bus F, 12kV Aux bus F, Bank 2. > [WOODACRE 1102> *PT*STAFFORD 1101 *PT*SAN RAFAEL 1108</div>	<div><div>Closed</div><div>24</div><div>detail</div></div> <div>IGNACIO 1103 BOLINAS 1101 IGNACIO 1103 GREENBRAE 1102 <SAN RAFAEL-BK2> <LAS GALLINAS SUB Bus 12kV Main bus F, 12kV Aux bus F, Bank 2. > <WOODACRE 1102] *PT*OLEMA 1101 *PT*ALTO 1122</div>	<div><div>Closed</div><div>25</div><div>detail</div></div> <div>GREENBRAE 1104 IGNACIO 1103 IGNACIO 1103 <SAN RAFAEL-BK2> <LAS GALLINAS SUB Bus 12kV Main bus F, 12kV Aux bus F, Bank 2. > *PT*OLEMA 1101</div>	<div><div>Closed</div><div>26</div><div>detail</div></div> <div>IGNACIO 1103 <SAN RAFAEL-BK2> <LAS GALLINAS SUB Bus 12kV Main bus F, 12kV Aux bus F, Bank 2. > [SAN RAFAEL SUB Bus 12kV Aux bus and 1105 circuit to first field switch. > [IGNACIO 1103> [IGNACIO 1103> [IGNACIO 1103></div>	<div><div>Closed</div><div>27</div><div>detail</div></div> <div>GREENBRAE 1102 <SAN RAFAEL-BK2> <LAS GALLINAS SUB Bus 12kV Main bus F, 12kV Aux bus F, Bank 2. > <SAN RAFAEL SUB Bus 12kV Aux bus and 1105 circuit to first field switch.] <IGNACIO 1103] <IGNACIO 1103> <IGNACIO 1103]</div>
<div><div>Closed</div><div>28</div><div>detail</div></div> <div>IGNACIO 1103 IGNACIO 1103 ALTO 1125 <SAN RAFAEL-BK2> <LAS GALLINAS SUB Bus 12kV Main bus F, 12kV Aux bus F, Bank 2. > <IGNACIO 1103></div>	<div><div>Closed</div><div>29</div><div>detail</div></div> <div>IGNACIO 1103 IGNACIO 1103 STAFFORD 1102 ALTO 1120 <SAN RAFAEL-BK2> <LAS GALLINAS SUB Bus 12kV Main bus F, 12kV Aux bus F, Bank 2. > <IGNACIO 1103> *PT*ALTO 1120 *PT*OLEMA 1101</div>					

CONFIDENTIAL

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 62-3470(Intranet)
ELECTRIC OPERATIONS

APPLICATION FOR:

SWITCHING LOG#

16-0007277

<input type="checkbox"/> CLEARANCE	<input type="checkbox"/> LOAD TRANSFER	<input checked="" type="checkbox"/> EOL NOTIFICATION	<input type="checkbox"/> TEST PROGRAM
<input type="checkbox"/> NON-TEST	<input type="checkbox"/> HOT WASH	<input type="checkbox"/> CUSTOMER WORK	<input type="checkbox"/> OTHER/NOTIFICATION
<input type="checkbox"/> RELAY WORK	<input type="checkbox"/> DEAD WASH	<input type="checkbox"/> NEW EQUIPMENT	

 CONTROL CENTER: Central DCC Received By: [REDACTED] Date: 1/22/2016 Time: 1302

 Requested By: [REDACTED] Phone: [REDACTED] Pager: N/A Cell: [REDACTED] FAX: N/A

 Requested For: [REDACTED] Phone: N/A Pager: N/A Cell: [REDACTED] Radio: N/A

 Start Date: 2/9/2016, Tuesday Time: 0830 Switching Time From: 0830 To: 0830

 End Date: 2/9/2016, Tuesday Time: 1600 Switching Time From: 1600 To: 1600 Check if Yes)

Line or Apparatus:

SAN RAFAEL 1108

Clearance Limits:

Open 3577 SAN RAFAEL-1108 Fuse 611 CASCADE DR. - FAIRFAX to E.O.L

Purpose:

Replace Pole

Work Location:

673 Cascade Dr, Fairfax

Crew Special Setups Required For Work:

EOL Notification

 Phasing/Rotation Required: Yes: ☐ No: ☒ Location: N/A Emergency Restoration: 4HRS

 Weather: CLEAR WEATHER ONLY PM # 31149223 PM Operation # 0110

Customer Shut Down(Date(s)/Time(s):

 NTFD
By: MAIL

 From Date: 2/9/2016 Time: 0830 To Date: 2/9/2016 Time: 1600

 From Date: N/A Time: N/A To Date: N/A Time: N/A

 Additional Clearance/Equipment
Required:

N/A

LOG#: N/A

Distribution Engineer	Sent for Review	Date: _____	Review Complete	Date: _____	By: _____
Protection Engineer	Sent for Review	Date: _____	Review Complete	Date: _____	By: _____
Control Center OK	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Date: <u>1/22/2016</u>			By: <u>[REDACTED]</u>

Remarks and additional information

[REDACTED]

Operations Special Setups Required For Switching or Work:

Attached Files:

Size in bytes

[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]



PLANNED OUTAGE DETAIL SHEET

FEEDER ID: San Rafael 1108

PM#: 31149223 Loc 1

Construction Type: ☒ O/H ☐ U/G ☐ Both
Outage Level: ☒ PRI ☐ TX ☐ SVC

SSD:

T-Number:

Tx CGC #:

Fuse 3577

313917354482, 313912954494, 313915254466, 313917454457,
313919354444, 313923154445

(All customers from 3577 to E.O.L)

DATE & TIME

Scheduled Begin Date: 2/9/16

Start Time: 0830

Scheduled End Date: 2/9/16

End Time: 1600

Switching Times

 to and

 to

NOTIFICATION

Notification Method: ☒ Mail ☐ Door-to-Door ☐ Phone

Date Notified: # of Customers Affected: 34

CONTACTS

Outage Coordinator (OC):

OC Internal Phone: ~

OC External Phone:

Supervisor Name &

Foreman Alternate Cell

Foreman Name:

Phone: (pager ok if no cell)

Supervisor's Org: ☐ Division ☒ G.C. ☐ Contractor ☐ Other/T-MAN

REMARKS

Must include type of work being performed, street, city, transformer coordinate or
T number, meter number (if applicable), clearance points, and circuit map.

Type of Work: Replace Pole

Work Location, City: 673 Cascade Dr, Fairfax

Additional Comments: N/A



PLANNED OUTAGE DETAIL SHEET - Continued

FOR USE ONLY WITH DOOR TO DOOR NOTIFICATIONS

Notified by: _____ Time Started notifying customers: _____

Date Notified
Customers door to door: _____ Time Finished notifying customers: _____

Provide meter numbers or addresses notified.

	<input type="checkbox"/> Door Hanger left <input type="checkbox"/> Customer was home
	<input type="checkbox"/> Door Hanger left <input type="checkbox"/> Customer was home
	<input type="checkbox"/> Door Hanger left <input type="checkbox"/> Customer was home
	<input type="checkbox"/> Door Hanger left <input type="checkbox"/> Customer was home
	<input type="checkbox"/> Door Hanger left <input type="checkbox"/> Customer was home
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	<input type="checkbox"/> Door Hanger left <input type="checkbox"/> Customer was home
	<input type="checkbox"/> Door Hanger left <input type="checkbox"/> Customer was home

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**Pacific Gas and
Electric Company®**

Transformer Outage Request

CONTROL CENTER: Central DCCSWITCHING LOG# 16-0011342DIVISION North Bay District North BayFEEDER ID# 042011108

Received By: _____ Date: _____ Time: _____
Internal Phone: _____ Ext Phone: _____ Alt Ext. Phone: _____

Requested By: Phone: Pager: N/A Cell: FAX: N/ARequested For: Phone: Pager: N/A Cell: Radio: N/ASupervisor's Org: ☒ Division ☐ G.C. ☐ Contractor ☐ Other

Shutdown

Start Date: 2/23/2016, Tuesday Time: 0830Customer Type: ☒ O/H ☐ U/GEnd Date: 2/23/2016, Tuesday Time: 1400

CGC #

Circuit

SSD

EQUIP Address

314089954354SAN RAFAEL-1108355761 TERRACE AVE., SAN ANSELMO

Customers Affected

NOTIFICATION

9Notification Method: ☒ Mail ☐ Door to Door ☐ Phone ☐ E-MAIL

Date Notified: _____

Purpose:

REPLACE TRANSFORMER

Work Location:

Weather: CLEAR WEATHER ONLY PM # 31167321 PM Operation # 110

Shutdown Processed :	Yes: <input type="radio"/> No: <input type="radio"/>	Date: _____	By: _____
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Concerned Parties Notified:

Remarks and additional information

Print

Email this Application


 62-3470(Intranet)
ELECTRIC OPERATIONS

APPLICATION FOR:

SWITCHING LOG#

16-0016150

<input checked="" type="checkbox"/> CLEARANCE	<input type="checkbox"/> LOAD TRANSFER	<input type="checkbox"/> EOL NOTIFICATION	<input type="checkbox"/> TEST PROGRAM
<input type="checkbox"/> NON-TEST	<input type="checkbox"/> HOT WASH	<input type="checkbox"/> CUSTOMER WORK	<input type="checkbox"/> OTHER/NOTIFICATION
<input type="checkbox"/> RELAY WORK	<input type="checkbox"/> DEAD WASH	<input type="checkbox"/> NEW EQUIPMENT	

 CONTROL CENTER: Central DCC Received By: ~~XXXX~~ Date: 2/29/2016 Time: 0814

 Requested By: XXXX Phone: XXXX Pager: N/A Cell: XXXX FAX: N/A

 Requested For: XXXX Phone: XXXX Pager: N/A Cell: XXXX Radio: N/A

 Start Date: 3/16/2016, Wednesday Time: 2200 Switching Time From: 1000 To: 2215

 End Date: 3/17/2016, Thursday Time: 0500 Switching Time From: 0500 To: 1100 Check if Yes)

Line or Apparatus:

SAN RAFAEL 1108

Clearance Limits:

 1851 SAN RAFAEL-1108 Switch MONO LN.,1ST POLE W/O BOLINAS RD.,FAIRFAX
 4365 SAN RAFAEL-1108 Fuse MONO AVE.,1ST POLE E/O BOLINAS, FAIRFAX

Purpose:

CREW WILL BE REMOVING 3 - 2AL CABLES FROM C/O 4365 TO T-721 AND INSTALLING 3 - 1/0 AL CABLES FROM C/O 4365 TO SW-55974 ON NEW 100/25 KVA 120/240 3PHASE TX T-62376 . CREW WILL ALSO INSTALL 3-1/0 CABLES FROM T-62376 TO EXISTING T-721

Work Location:

31 BOLINAS AVE FAIRFAX

Crew Special Setups Required For Work:

ANY SWITCHING NEEDED TO SET UP CIRCUIT FOR SHUTDOWN NEEDS TO BE COMPLETED BEFORE CUSTOMER SHUTDOWN TIME OF 22:00 .

 Phasing/Rotation Required: Yes: ☒ No: ☐ Location: 4365 Emergency Restoration: 7HRS

 Weather: LIGHT PRECIPITATION PM # 31164908 PM Operation # N/A

Customer Shut Down(Date(s)/Time(s):

 NTFD
By: MAIL

 From Date: 3/16/2016 Time: 2200 To Date: 3/17/2016 Time: 0500

 From Date: N/A Time: N/A To Date: N/A Time: N/A

 Additional Clearance/Equipment
Required:

N/A

LOG#: N/A

Distribution Engineer	Sent for Review	Date: _____	Review Complete	Date: _____	By: _____
Protection Engineer	Sent for Review	Date: _____	Review Complete	Date: _____	By: _____
Control Center OK	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Date: <u>3/4/2016</u>			By: <u>CTC4</u>

Remarks and additional information

Operations Special Setups Required For Switching or Work:

N/A

Attached Files:

Size in bytes